

New York State Department of Environmental Conservation

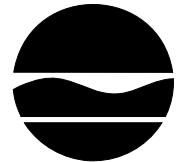
Division of Environmental Remediation

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Joe Martens
Commissioner

December 11, 2013

Ms. Kelly Morris
Executive Director
Glen Cove Community Development Agency
City of Glen Cove – City Hall
9 Glen Street
Glen Cove, New York 11542

RE: Gravies Point Redevelopment Area
Glen Cove (C), Nassau County
Pre-Construction Confirmatory/Data Gap
Subsurface Work Plan

Dear Ms. Morris:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health (NYSDOH), has reviewed the Pre-Construction Confirmatory/ Data Gap Subsurface Investigation Work Plan dated November 2013 and has the following comments:

1. General Comment: Prior to any intrusive work (test pits, soil borings, etc.) on the Li Tungsten site a radiological walkover survey/scan must be completed.
2. General Comment: The NYSDEC Restricted Residential Clean-up Criteria for Arsenic is 16 mg/kg. Please revise accordingly.
3. General Comment: Any environmental sampling/analysis of soils or waters for radiological purposes needs to be analyzed by a certified ELAP laboratory utilizing the appropriate sampling methods. (<http://www.wadsworth.org/labcert/elap/elap.html>).
4. Section 1.0 Introduction: The Li Tungsten site (Site No. 130046) does not have an approved Site Management Plan. Please correct this reference.
5. Section 1.1 Site Background: This section was not reviewed for accuracy, however, it was noted that the City of Glen Cove collected data on NYSDEC Inactive Hazardous Waste Sites. This data was not submitted to the Department for review. Please submit the findings report related to this data to the Department.
6. Section 2.0 Proposed Redevelopment: All soils removed on a NYSDEC Inactive Hazardous Waste Site as part of the Garvies Point Redevelopment Area will need to be managed in accordance with that Site's Site Management Plan.

7. Section 4.1 Site Preparation: All appropriate storm water and SPDES permits must be obtained prior to site work beginning.
8. Section 4.1.1 Clearing and Grubbing: A qualified Health Physics Technician shall be present for all intrusive work on the Li Tungsten and Capitan's Cove Condominium Sites.
9. Section 4.1.2: The dredge spoils currently located Parcel A must be removed and disposed of in conformance with all federal, state, and local laws, rules, and regulations prior to any investigative work.
10. Section 4.3 Test Pits: Please remove the reference to the PWGC's Excavation Work Plan – Bulkhead Test Pits, and outline the protocol that will be used for this work that is in compliance with the requirements of the Glen Cove Ferry Terminal Site Management Plan - Soil Excavation requirements.
11. Section 4.3 Test Pits: If any soils exceed the radiation or PID action levels or if grossly contaminated material (i.e., soils exhibiting staining, product, petroleum odors) or residual source material are encountered, the impacted soil or material will be excavated and disposed of properly.
12. Section 4.3: Please revise and submit for review Appendix C - Radiation Control Plan based on the following comments:
 - a. The work plan shall be reviewed and approved by a certified Health Physist or a Licensed Professional Nuclear Engineer.
 - b. The work plan at a minimum will discuss the radiological survey methodologies including walkover survey protocols and collection of and screening of cores.
 - c. The work plan will include a list of the instrumentation that will be used including model number, associated probes, serial number and calibration date.
 - d. The work plan will require accurate background measurements (one (1) minute static count) be taken prior to the start of work at each location.
 - e. Cores shall be screened utilizing a a frisker (Ludlum Model 3 w a GM 44-9 or equivalent) or a Ludlum 2224 w a 43-89 probe or equivalent.
 - f. Core readings greater than two (2) times background will require further investigation.
 - g. Walkover surveys will be performed utilizing a Ludlum 2221 coupled with a 2 x 2 NaI detector or equivalent.

- h. When readings greater than or equal to two (2) times background are discovered, further investigation is required. If the affected soil is removed to a low background area for additional scanning/screening, the removed material should be spread in layers no greater than 6-inches; particularly if the material is wet/mud. Not only would it be difficult to traverse to perform the survey, the mud/wet soil will affect survey sensitivity.
- i. The work plan shall address any potential worker health and safety issues including, but not limited to, PPE and action levels.

13. Section 4.3.2 Backfill and Restoration: Backfilling of test pits will be completed in accordance to the Captain's Cove Site Management Plan. Please revise section accordingly.

It is understood that this work plan was not prepared to address the Li Tungsten Data Gap Analysis provided to the City of Glen Cove on November 8, 2013. To allow the NYSDEC to complete the review of the City's request for an Explanation of Significant Differences (ESD) allowing restricted residential development on the Li Tungsten Parcel A property and to ensure that the requirements of the Li Tungsten 2005 ESD were met on Parcels B and C additional work as outlined in the November 8, 2013 letter will need to be completed.

Should you have any questions or concerns please contact me at 518-402-9814 or hmdudek@gw.dec.state.ny.us.

Sincerely,



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